

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,
v.
ZACKARY ELLIS SANDERS,
Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Trial: Oct. 19, 2021

**MOTION TO SEAL DEFENDANT'S MOTION TO RECONSIDER THE EXCLUSION
OF THE TESTIMONY OF DR. TYLER WHITNEY**

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting the entirety of his Memorandum in Support of Motion to Reconsider the Exclusion of the Testimony of Dr. Tyler Whitney to be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress